

ORIGINAL

INTERVENTION



0000135043

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

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AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission

DOCKETED

MAR - 9 2012

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IN THE MATTER OF Q-LINK WIRELESS
LLC'S PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF ARIZONA ON A
WIRELESS BASIS (LOW-INCOME ONLY)

DOCKET NO. T- 20824A-11-0446

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105, the Arizona Local Exchange Carriers Association
("ALECA") hereby moves to intervene in the above-captioned case.

I Service

Please serve all documents on:

Craig A. Marks
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10645 N. Tatum Blvd., Ste. 200-676
Phoenix, Arizona 85028
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(480) 367-1956 (Fax)
Craig.Marks@azbar.org
Attorney for ALECA

II Interest in Proceeding

ALECA is comprised of small telephone companies and member-owned cooperatives,
all of which are providing local exchange telecommunications services to customers in rural,
high cost areas of Arizona, and all of which are "rural telephone companies" as defined by the
Communications Act of 1934, as amended (the "Act") 47 U.S.C. 0 153(37). ALECA's members
are:

- Fort Mojave Telephone Company;
- Frontier Communications Corporation;
- Gila River Telecommunications, Inc.;

- 1 • Hopi Telecommunications, Inc.;
- 2 • Midvale Telephone Exchange, Inc.;
- 3 • San Carlos Apache Telecommunications Utility, Inc.;
- 4 • South Central Communications;
- 5 • Table Top Telephone Company, Inc.;
- 6 • TDS;
- 7 • Tohono O'odham Utility Authority; and
- 8 • Valley Telephone Cooperative; and
- 9 • Zona Communications.¹

10 Each ALECA member, including its Tribally-owned members, receives support from the
11 Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides
12 discounted Lifeline telephone service and receives compensation for the discounts from the
13 FUSF. Q-Link Wireless LLC ("Q-Link") seeks designation as an Eligible Telecommunications
14 Carrier ("ETC") so that it may provide the services identified in its Application to eligible
15 customers in Arizona. ALECA is concerned that Q-Link's proposed service offerings may
16 unfairly duplicate the similar offerings of its member companies, cause the FUSF requirements
17 to grow to the point where its member companies' FUSF compensation is endangered, and
18 undermine public support for the FCC's universal service programs. Finally, Q-Link's request
19 may raise jurisdictional issues concerning the provision of services on tribal lands.

20 ALECA reserves the right to take positions on any other issues in this case.

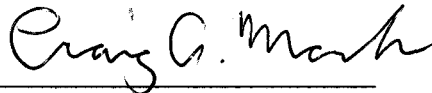
21 No other party can adequately represent ALECA's interests.

22 **III Requested Relief**

23 ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on March 9, 2012.
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15 **Original and 13 copies filed**
16 on March 9, 2012, with:
17

18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007
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23 **Copy of the foregoing mailed**
24 on March 9, 2012, to:
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